

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

RYAN WOODSON,

Plaintiff,

v.

CITY OF DALLAS et al.,

Defendants.

§
§
§
§
§
§
§
§
§

CIVIL ACTION NO. 25-cv-1748

DEFENDANT CITY OF DALLAS'S NOTICE OF REMOVAL

Defendant City of Dallas (the "City"), pursuant to 28 U.S.C. § 1441, hereby files this Notice of Removal, removing to this federal district court the civil action styled *Ryan Woodson v. City of Dallas et al.*, DC-24-19332, filed in the district court of Dallas County, Texas.¹ In support hereof, the City respectfully shows as follows.

Introduction

1. Plaintiff Ryan Woodson filed this action in the 193rd Judicial District Court of Dallas County, Texas on October 29, 2024, naming the City as a defendant. (*See* Index of Documents and Pleadings Filed in State Court (Original Petition)).

2. The City was served with civil process on June 6, 2025. (*See* Index of Documents and Pleadings Filed in State Court ("Index") at Doc. 1-50 (Executed Citation - City of Dallas)). The City timely answered Plaintiff's Original Petition on June 30, 2025 and demanded trial by jury. *Id.* at Doc. 1-97 (City of Dallas Original Answer).

¹ As of the date of this filing, individual Defendants have not been served with process and therefore are not before this Court. This Notice of Removal is therefore filed solely by Defendant City of Dallas.

3. Under 28 U.S.C. § 1446(b), “notice of removal of a civil action or proceeding shall be filed within 30 days after the receipt by the defendant, through service or otherwise, of a copy of the initial pleading setting for the claim for relief upon which such action or proceeding is based . . . [.]” 28 U.S.C. § 1446(b)(1). Plaintiff’s Original Petition, which expressly injects federal claims into this litigation, is the pleading from which one could first ascertain that this case is removable. The City files this notice of removal within the period allowed for removal under 28 U.S.C. § 1446(b)(1). Removal of this action is, therefore, timely.

Nature of the Suit

4. This is a civil rights action for money damages brought pursuant to 42 U.S.C. § 1983. Plaintiff alleges that the City, *inter alia*, violated his Fourth and Fourteenth Amendment rights in searching his property and using excessive force in detaining him. *See* Index at Doc. 1-4 (Original Petition). Plaintiff brings claims against the City and its agents under 42 U.S.C. § 1983. *Id.* at pp. 21-22.

Basis for Removal

8. Removal is proper because Plaintiff’s Original Petition asserts matters in dispute over which the United States District Court has original jurisdiction pursuant to 28 U.S.C. §§ 1331 and 1343. *See* 28 U.S.C. § 1441. Specifically, Woodson brings claims against the City pursuant to 42 U.S.C. § 1983 for alleged deprivations, under color of law, of rights secured by the Fourth and Fourteenth Amendments to the United States Constitution. *See also* 28 U.S.C. § 1143. The City is entitled by statute to remove the case to federal court because Woodson claims present a federal question.

9. Plaintiff's petition also alleges Texas state law tort claims against the City for negligence, and these state law claims are likewise removable because they have been brought together with her federal claims. *See* 28 U.S.C. § 1441(c).

Jury Demand

10. The City of Dallas has demanded a trial by jury in the state court action.

Notice of the Removal is Procedurally Correct

11. The City's Notice of Removal is procedurally correct. All defendants who have been served and appeared and who are subject to suit join in the removal of this action, as reflected by the signature of counsel on the notice.

12. The City will be manually filing the documents filed in state court as required by 28 U.S.C. § 1446(a) and N.D. Tex. Local Civ. R. 81.1(a) because they are too voluminous to file electronically.

13. Venue is proper in this district court under 28 U.S.C. § 1441(a) because this district and division embrace the place in which the removed action is pending.

14. The City will promptly file a copy of this notice of removal with the clerk of the state court in which the action is pending.

Respectfully submitted,

CITY ATTORNEY OF THE CITY OF
DALLAS

Tammy L. Palomino
City Attorney

/s/ J.Cheves Ligon
J. CHEVES LIGON
Senior Assistant City Attorney
State Bar No. 24111401
Email: John.Ligon@Dallas.gov

City Attorney's Office
1500 Marilla Street, Room 7D North
Dallas, Texas 75201
Telephone: 214-670-1236
Telecopier: 214-670-0622

**ATTORNEYS FOR DEFENDANT
CITY OF DALLAS**

CERTIFICATE OF SERVICE

I hereby certify that on July 7, 2025, a true and correct copy of the foregoing document was served upon Plaintiff Ryan Woodson via email at rwcalif@gmail.com which is the email address Mr. Woodson provided in the contact information listed in his Original Petition.

/s/ J.Cheves Ligon
Senior Assistant City Attorney